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16 UNITED STATES DISTRICT COURT
17 DISTRICT OF NEVADA

18 Gabriel Santacruz,
19 Plaintiff,
20 v.
21 Charles Daniels, et al.,
22 Defendants.

Case No. 2:23-cv-0258-APG-BNW

**Joint discovery order and
scheduling order**

**Submitted in compliance with LR
26-1(B)**

23 Ryan Norwood and Christopher Frey, attorneys for plaintiff, conferred with
24 Jessica Brown, attorney for defendants, on January 8, 2024, by phone and agreed to
25 the following discovery and scheduling order.
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- 1 1. Discovery cut-off date; estimate of time required for discovery (LR 26-
2 1(b)(1); Fed. R. Civ. P. 16(b)):

3 The parties may engage in discovery for a period of one hundred and eighty
4 (180) days, beginning on December 12, 2024, and ending on **June 10, 2024.**

- 5 2. Pleadings to amend or join parties (LR 26-1(e)(2)):

6 Pleadings that may be brought under Fed. R. Civ. Pro. 13 & 14, or joining
7 additional parties under Fed. R. Civ. Pro. 19 & 20, or amendments to pleadings as
8 provided for under Fed. R. Civ. Pro. 15 shall be filed by March 12, 2024.

- 9 3. Disclosure of expert witnesses (LR 26-1(e)(3); Fed. R. Civ. P.
10 26(a)(2)(C)(i)):

11 The parties shall make any expert disclosures by April 11, 2024 (60 days
12 prior to June 10, 2024), and shall make any disclosure of rebuttal expert by May 13,
13 2023 (32 days after April 11, 2024).

- 14 4. Dispositive motions (LR 26-1(e)(4); Fed. R. Civ. P. 56):

15 The last day to file dispositive motions shall be July 10, 2024 (30 days after
16 June 10, 2024).

- 17 5. Pretrial order and disclosures (LR 26-1(b)(5) and LR 26-1(b)(6); Fed. R.
18 Civ. P. 26(a)(3)(B) and Fed. R. Civ. P. 26(a)(4)):

19 In accordance with Local Rule 26-1(b)(5), the last day to file the Joint Pretrial
20 Order (including the disclosures required by Fed. R. Civ. P. 26(a)(3) and any
21 objections thereof) shall be August 9, 2024. In the event that dispositive motions
22 are filed, the deadline for filing the Joint Pretrial Order shall be suspended until
23 thirty (30) days after the decision on the dispositive motions or further order of the
24 Court.

1 6. Extensions or modifications of the discovery plan and scheduling order
2 (LR 26-3)

3 In accordance with Local Rule 26-3, any request for an extension of this
4 discovery plan or any of the individual dates herein shall be filed and served no
5 later than twenty-one (21) days before the expiration of the subject deadline. Any
6 motion or stipulation shall include:

- 7 a) A statement specifying the discovery completed;
8 b) A specific description of the discovery that remains to be completed;
9 c) The reasons why the deadline was not satisfied, or the remaining
10 discovery was not completed within the time limits set by the discovery
11 plan; and
12 d) A proposed schedule for completing all remaining discovery.

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14 The parties certify that they have discussed previously sought resolution of
15 the case via alternative dispute resolution. See LR 26-1(b)(7). They also certify
16 that they have considered the use of the procedures set forth in LR 26-1(b)(8) and
17 the use of electronic evidence as described under LR 26-1(b)(9), but have not entered
18 any stipulations or agreements regarding such at this time.

1 Dated January 10, 2024.
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4 Aaron D. Ford
5 Attorney General

Rene L. Valladares
Federal Public Defender


6 /s/ Jessica E. Brown
7

/s/ Ryan Norwood
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9 Jessica E. Brown
10 Deputy Attorney General

Ryan Norwood
Assistant Federal Public Defender

11 IT IS SO ORDERED:
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15 Dated: 1/11/2024
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